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9 *Attorneys for Claimant*

Rowland Marcus Andrade

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 ONE PARCEL OF REAL PROPERTY
18 LOCATED AT 9414 PLAZA POINT DRIVE,
MISSOURI CITY, TEXAS 77459,

19 Defendant.

20 ROWLAND MARCUS ANDRADE,

21 Claimant.

27 SOLMAZ ANDRADE,

28 Claimant.

Case No. 3:20-cv-2013-RS

**DECLARATION OF ROWLAND
MARCUS ANDRADE IN IN SUPPORT OF
MOTION FOR LEAVE TO FILE
MOTION FOR PARTIAL
RECONSIDERATION**

*Filed concurrently with NOTICE OF MOTION
AND MOTION OF ROWLAND MARCUS
ANDRADE FOR LEAVE TO FILE MOTION
FOR PARTIAL RECONSIDERATION;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF BRIAN
J. BECK IN SUPPORT OF MOTION FOR
LEAVE TO FILE MOTION FOR PARTIAL
RECONSIDERATION; AND [PROPOSED]
ORDER*

Judge: Hon. Richard Seeborg

Trial Date: None Set

Hearing Date: September 3, 2020, 1:30 p.m.

1
2 WILMINGTON SAVINGS FUND SOCIETY,
3 FSB as trustee for IRP FUND II TRUST 2A,

4 Claimant.

5
6 **DECLARATION OF ROWLAND MARCUS ANDRADE**

7 I, Rowland Marcus Andrade, declare as follows:

8 1. I am a party in the above-entitled action. I have personal knowledge of the facts set
9 forth herein, except as to those stated on information and belief and, as to those, I am informed
10 and believe them to be true. If called as a witness, I could and would competently testify to the
11 matters stated herein.

12 2. I learned, around July 8, 2020, that the declaration of AUSA Chris Kaltsas that the
13 government filed under seal in support of its motion to stay appeared to claim that I was
14 liquidating equity in “various assets [I] had purchased with purportedly ill-gotten funds” around
15 February 10, 2020. That is false. I was not seeking to liquidate equity in any of assets on or around
16 February 10, 2020 that were listed on the complaint.

17 3. I had put my house, the defendant parcel of real estate in Missouri City, Texas, up
18 for sale in December 2018, but I did not ultimately sell the house. Instead, I took out a loan using
19 the property as collateral in April 2019. The reason I took out that loan was to raise proceeds to
20 fund the continued development of my AML Bitcoin technology.

21 4. In September 2019, I took out a mortgage on my house, paying back the April 2019
22 loan in full and using the remaining balance to complete development of the AML Bitcoin
23 technology.

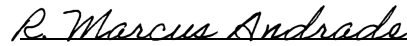
24 5. I also owned a separate parcel of land in Corpus Christi, Texas. I took out a loan
25 using this property as collateral in February 2019, and then sold that land in June 2019. The
26 money from those transactions also went into development of the AML Bitcoin technology.

27 6. I also swear and confirm that I have been a victim of racial discrimination on
28 multiple occasions throughout my life—including this selective prosecution. I pray that all people

1 will be treated equally regardless of race, gender, age, or social status. We all breathe the same air
2 and eat the same food. No one should be treated differently based on their connections and
3 influence with powerful government officials, or their lack thereof.

4
5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct.

7 Executed on this 29th day of July, 2020, at Missouri City, Texas.

8
9 
10 Rowland Marcus Andrade